



P O Box 13222
Sacramento CA 95813-6000

5 August 1998

Wayne Praskins
United States
Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Subject: Perchlorate PRPs

Dear Mr. Praskins:

During the past year, Aerojet has submitted numerous oral and written requests for and also substantial supporting documentation regarding the naming of Day and Night Manufacturing as a PRP due to the high potential for it to have released perchlorate and VOCs to the soil and groundwater. Recently as part of a telephone conversation with Dr. Suzanne Phinney of Aerojet, John Kemmerer of EPA indicated that an 104e request to Day and Night's successor was forthcoming. Several weeks ago, Keith Takata indicated to Dr. Phinney that a letter would be sent by EPA to Day and Night within two weeks. During our telephone conversation of 21 July 1998 you indicated that EPA was still evaluating the line of successors for Day and Night's ownership.

Aerojet has also submitted documentation that substantial fireworks (known to be manufactured using perchlorate) were disposed of by burning on the ground in the ALR landfill. Further, Aerojet has pointed out that early data on perchlorate concentrations in groundwater indicate higher concentrations of perchlorate are present some distance downgradient and south of Aerojet than are found on Aerojet property. Still further, Aerojet has pointed out that perchlorate has been discovered in groundwater in numerous locations remote from the BPOU thus indicating the potential for other sources of perchlorate within the BPOU.

Aerojet has taken the lead with the BPOU Steering Committee, the Watermaster and with La Puente County Water District in seeking to address perchlorate concerns. Notwithstanding these efforts, there is no specific evidence that Aerojet is any more responsible for release of perchlorate than Day and Night. Available evidence also suggests that there may be other government PRPs. Aerojet feels very strongly that EPA is mandated to make reasonable attempts to define perchlorate PRPs. Despite our attempts to assist in this effort, EPA appears to be languishing in its efforts.

Wayne Praskins
5 August 1998
Page 2 of 2

Aerojet requests EPA to respond to Aerojet's numerous communications, send the 104e request to Day & Night successors, and develop a program to determine sources of perchlorate and define PRPs.

Very truly yours,

A handwritten signature in black ink, appearing to read "Donald E. Vanderkar". The signature is fluid and cursive, with a large initial "D" and "V".

Donald E. Vanderkar
Director
Site Restoration Programs

cc: RC Anderson, Aerojet
SL Phinney, Aerojet
GB Swanick, Aerojet
P Taft, Munger, Tolles & Olson
J Catts, Harding Lawson Associates